

# **EXHIBIT B**

**Jeremy Roller**

**From:** Josephine Kim <JOSKIM@sternekessler.com>  
**Sent:** Thursday, April 11, 2024 10:55 AM  
**To:** YANG Qianwu; Jeremy Roller  
**Cc:** SHM Momcozy; Alex Alfano; Walters@lowegrahamjones.com; ELVIE-MOMCOZY-DJ; 23-631-Momcozy-Elvie  
**Subject:** RE: Proposed modification to the current case schedule

Hi Wu and Jeremy,

Thank you for sending Momcozy's proposed schedule. In the interest of resolving this amicably, below is our counter-proposal. We feel this should be satisfactory because it: (1) increases the time between disclosure of contentions and trial; and (2) follows the spacing between events requested by Momcozy except where mandated by the Local Rules.

We are happy to discuss these changes during our call this evening/morning.

Event	Source	Current Schedule	Momcozy's Proposed Schedule	Elvie's Proposed Schedule
Preliminary Infringement Contentions	Scheduling Order	June 10	August 1	May 13
Preliminary Non-Infringement and Invalidity Contentions	Scheduling Order	July 1	September 5	June 17
Exchange of Proposed Terms and Claim Elements for construction	Local Patent Rule 130 (within 20 days of contentions)	July 22	September 26	July 3
Preliminary Claim Chart Exchange of Preliminary Claim Constructions and Extrinsic Evidence	Scheduling Order; Local Patent Rule 131 (within 30 days of disclosing proposed terms)	Sept. 9	October 25	August 2
Expert Reports on Claim Construction	Scheduling Order	July 29	December 11	Sept 18
Rebuttal Expert Reports on Claim Construction	Scheduling Order	Aug. 23	January 10	Oct 18
Joint Claim Chart and Prehearing Statement	Scheduling Order; Local Patent Rule 132 requires (within 45 days of Preliminary Claim Constructions)	Oct. 3	December 11	Sept 16
Completion of Claim Construction Discovery	Local Patent Rule 133 (within 50 days of Joint Claim Chart and Prehearing Statement)	N/A	February 6	Nov 5

Opening Claim Construction Briefs	Scheduling Order; Local Patent Rule 134 (within 55 days of Joint Claim Chart and Prehearing Statement)	Oct. 28	February 13	Nov 8
Responsive Claim Construction Briefs	Scheduling Order; Local Patent Rule 134 (within 15 days of opening claim construction brief)	Nov. 12	February 28	Nov. 22
Markman Hearing	Scheduling Order	Dec. 16	To be set by the Court	Dec. 16
Expert Reports	Scheduling Order	Feb. 3		Feb. 3
Rebuttal Expert Reports	Scheduling Order	Mar. 3		Mar. 3
Deadline for Discovery Motions	Scheduling Order	Feb. 20		Feb. 20
Close of Discovery	Scheduling Order	Mar. 24		Mar. 24
Dispositive Motions + Motions Challenging Expert Testimony	Scheduling Order	Apr. 30		Apr. 30
Settlement Conference	Scheduling Order	June 2		June 2
Motions in Limine	Scheduling Order	Aug. 4		Aug. 4
Joint Pretrial Order	Scheduling Order	Aug. 15		Aug. 15
Pretrial Conference	Scheduling Order	Aug. 18		Aug. 18
Trial Briefs, Voir Dire Questions, and Jury Instructions	Scheduling Order	Aug 26.		Aug 26.
Trial	Scheduling Order	Sept. 2		Sept. 2

Regards,  
Josephine

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**Josephine Kim**  
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**From:** YANG Qianwu <[yang@shm.law](mailto:yang@shm.law)>  
**Sent:** Tuesday, April 9, 2024 9:13 AM  
**To:** Josephine Kim <[JOSKIM@sternekessler.com](mailto:JOSKIM@sternekessler.com)>  
**Cc:** SHM Momcozy <[ShmMomcozy@shm.law](mailto:ShmMomcozy@shm.law)>; Alex Alfano <[aalfano@sternekessler.com](mailto:aalfano@sternekessler.com)>; Jeremy Roller <[jroller@aretelaw.com](mailto:jroller@aretelaw.com)>; Walters@lowegrahamjones.com; ELVIE-MOMCOZY-DJ <[ELVIE-MOMCOZY-DJ@sternekessler.com](mailto:ELVIE-MOMCOZY-DJ@sternekessler.com)>; 23-631-Momcozy-Elvie <[23-631-momcozy-elvie@shm.law](mailto:23-631-momcozy-elvie@shm.law)>  
**Subject:** Re: Proposed modification to the current case schedule

**EXTERNAL EMAIL:** Use caution before clicking links or attachments.

Hi Josephine,

Good morning.

After taking all factors into consideration, the following are our proposed modifications to the current schedule. We look forward to amicably negotiating a resolution with Elvie.

<b>Events Up To Claim Construction</b>	<b>Current Schedule</b>	<b>Proposed Modification (in blue)</b>
<b>JURY TRIAL DATE</b>	<b>September 2, 2025 at 01:30 pm</b>	To be set by the Court
Length of Trial	10 days	10 days
Preliminary infringement contentions and disclosure of asserted claims	June 10, 2024	August 1, 2024
Disclosure of preliminary non-infringement and invalidity contentions	July 1, 2024	September 5, 2024
Exchange of Proposed Terms and Claim Elements for Construction	n/a	September 26, 2024
Preliminary Claim Chart Exchange of Preliminary Claim Constructors and Extrinsic Evidence	September 9, 2024	October 25, 2024
Joint claim chart construction and Prehearing Statement	October 3, 2024	December 11, 2024
Opening expert disclosures for claim construction	July 29, 2024	December 11, 2024
Rebuttal expert disclosures for claim construction	August 23, 2024	January 10, 2025
Completion of claim construction discovery		February 6, 2025
Opening claim construction briefs	October 28, 2024	February 13, 2025
Responsive claim construction briefs	November 12, 2024	February 28, 2025
Claim construction hearing	December 16, 2024	To be set by the Court
Claim construction order		When issued by the Court

Best regards,

Wu